

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF
DAUBERT MOTION TO EXCLUDE TESTIMONY OF MARK ROBBINS, PH.D.**

DANIEL A. NIGH hereby certify as follows:

1. I am an attorney at law within the State of Florida and a shareholder with the law firm of Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A., and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Mark Robbins, Ph.D.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of Dr. Robbins' Expert Report.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of Dr. Robbins' Deposition Testimony taken March 8, 2022.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of *Geiss v. Target Corp.*, 2013 WL 4675377 (D.N.J. 2013).

5. Attached hereto as **Exhibit 4** is a true and accurate copy of TORRENT-MDL2875-00010961.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of *Mondis Tech. Ltd. v. LG Elecs., Inc.*, No. 15-4431, 2021 WL 4077563 (D.N.J. Sept. 8, 2021).

7. Attached hereto as **Exhibit 6** is a true and accurate copy TORRENT-MDL2875-00072542.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of TORRENT-MDL2875-00504801.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of TORRENT-MDL2875-00131251.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of TORRENT-MDL2875-00005067.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of the invoice received from Analysis Group.

12. Attached hereto as **Exhibit 11** is a true and accurate copy of *Manning v. Crockett*, No. 95-C3117, 1999 WL 342715 (N.D.Ill. May 18, 1999).

13. Attached hereto as **Exhibit 12** is a true and accurate copy of *Bank of New York Mellon v. WMC Mortgage, LLC*, 2015 WL 4887446 (S.D.N.Y. Aug. 17, 2015).

14. Attached hereto as **Exhibit 13** is a true and accurate copy of *In re M/V MSC Flaminia*, 2017 WL 3208598 (S.D.N.Y. July 28, 2017)

15. Attached hereto as **Exhibit 14** is a true and accurate copy of *Pac. Life Ins. Co. v. Bank of New York Mellon*, 2021 WL 5299193 (S.D.N.Y. Nov. 15, 2021)

16. Attached hereto as **Exhibit 15** is a true and accurate copy TORRENT-MDL2875-00124209.

Dated: May 3, 2022

Respectfully submitted:

/s/Daniel A. Nigh

Daniel A. Nigh

**Levin, Papantonio, Rafferty, Proctor,
Buchanan, O'Brien, Barr & Mougey,
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